

BLANK ROME, LLP  
Attorneys for Defendants  
SUNDERSONS, LTD  
SIMRAN MEHER LTD.  
CONTI-AGRO NIGERIA LTD.  
VALECHHA HOLDINGS LIMITED  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JALAPA SHIPPING LIMITED,

Plaintiff,

-against-

SUNDERSONS LTD., et al.,

Defendants.

07 Civ. 8715 (RJH)

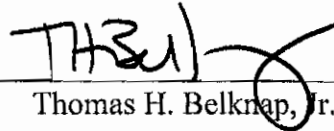
**AFFIDAVIT OF THOMAS H. BELKNAP, JR.**  
**IN SUPPORT OF MOTION TO VACATE ATTACHMENT ORDER**

City of New York :  
: ss  
County of New York :

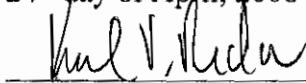
THOMAS H. BELKNAP, JR., being duly sworn, hereby deposes and says:

1. I am a partner of Blank Rome LLP, counsel for defendants Sundersons, Ltd, Simran Meher Ltd., Conti-Agro Nigeria Ltd., and Valechha Holdings Limited. I submit this affidavit in support of their motion to vacate the order of attachment in this matter as against them on the grounds that plaintiff's complaint fails adequately to plead an "alter ego" cause of action against any of them. I am fully familiar with the facts set forth in this affidavit.
2. Attached herewith as exhibit A is a true and accurate copy of plaintiff's London solicitor's letter dated June 27, 2007, referring to their January 16, 2007 demand for arbitration, and demanding arbitration against Milan Nigeria Limited and Sundersons, Ltd. in respect of this matter and appointing an arbitrator.
3. Attached as exhibit B is a true and accurate copy of defendants' solicitor's e-mail dated August 7, 2007 appointing an arbitrator on behalf of Milan Nigeria Limited and Sundersons Limited.
4. Attached as exhibit C is a true and accurate copy of an e-mail message dated January 23, 2008 which I sent to plaintiff's New York counsel, Peter Skoufalos, Esq., in which I advised of my clients' intention to make a motion to vacate the order of attachment in this matter on the basis that plaintiff's alter ego allegations were insufficiently pled and giving plaintiff the opportunity to amend its complaint before defendants made their motion.
5. Attached as exhibit D is a true and accurate copy of plaintiff's Second Amended Complaint filed on March 11, 2008.

6. Attached as exhibit E is a true and accurate copy of the transcript of the March 4, 2008 hearing before Judge Crotty in the matter Far Eastern Shipping Co. PLC v. Sea Transport Contractors Ltd., 07 cv 9887 (PAC). In that matter, Judge Crotty granted defendants' motion to vacate an attachment as against certain alleged "alter ego" defendants who had been sued pursuant to the Amended Complaint attached hereto as exhibit F.

  
Thomas H. Belknap, Jr.

Sworn to before me on this  
24<sup>th</sup> day of April, 2008

  
Notary Public

KARL V. REDA  
Notary Public, State of New York  
No. 30-4783126, Qual. in Nassau Cty.  
Certificate Filed in New York County  
Commission Expires 